## The People's Consultants Whistleblower Policy Draft 4/10/25

Introduction and Purpose. In keeping with the policy of maintaining the highest standards of conduct and ethics, the People's Consultants (tPC) will investigate complaints of 'Suspected Wrongdoings' occurring within its programs and services; fraudulent or dishonest use or misuse of its resources or property; violations of agency policy; and violations of local, state, and federal law. The Board encourages employees, contractors, board members, volunteers, clients, and community members to report all 'Suspected Wrongdoings' according to the procedures set forth below.

This policy supplements, and does not replace, any procedures required by law, regulation, or funding source requirements.

*Good Faith*. A person reporting concerns under this policy must act in good faith and have reasonable grounds for believing that the information reported indicates that a 'Suspected Wrongdoing' has occurred. A person who makes an allegation maliciously or with good reason to believe that the allegation was false will be subject to disciplinary action, up to and including termination of services.

**Reporting**. A person's concerns about 'Suspected Wrongdoing' should be reported to the President of tPC's Board of Directors.

Reports of 'Suspected Wrongdoing' should contain the names of the individuals involved, dates, and a description of the actions believed to be a 'Suspected Wrongdoing'. At no time should an individual who has reported or is considering reporting a 'Suspected Wrongdoing' undertake an independent investigation into the matter to obtain additional information.

Confidentiality. The tPC encourages anyone reporting 'Suspected Wrongdoing' to identify himself or herself when making a report to facilitate the investigation of the 'Suspected Wrongdoing'. However, reports may be submitted anonymously by mailing a written statement to the People's Consultants, 9 Spartina Crescent, Bluffton, SC 29910. Reports of 'Suspected Wrongdoing' will be kept confidential to the extent possible, but confidentiality cannot be guaranteed in light of the need to conduct an adequate investigation, to comply with all applicable laws, and to cooperate with law enforcement.

*Investigation*. Reports of 'Suspected Wrongdoing' will be promptly reviewed and analyzed by the tPC's Board of Directors or the president of the Board. Appropriate corrective action will be taken if warranted by the investigation, and findings may be communicated to the reporting person, to the extent reasonably possible and consistent with any privacy and confidentiality limitation.

Upon receipt of a good faith report, the President of the Board of Directors shall promptly notify the individual who reported the 'Suspected Wrongdoing' (to the extent that the individual's identity is disclosed or a return address is provided) that he/she has received the report and will investigate it.

In the event a report of 'Suspected Wrongdoing' is made concerning the designated President of the Board of Directors, the report will be investigated by the Treasurer.

**No Retaliation**. No employee, contractor, board member, volunteer, client, or community member who in good faith reports 'Suspected Wrongdoing', or who cooperates in the investigation of 'Suspected Wrongdoing', shall suffer harassment, retaliation, or adverse employment or other consequences. Any such retaliation should be reported, and the tPC will promptly investigate the report, consistent with the procedures contained in this policy.

Anyone within the tPC who retaliates against another individual for reporting 'Suspected Wrongdoing' or cooperating with an investigation of 'Suspected Wrongdoing' is subject to discipline up to and including termination of services.

Approved by the Board of Directors

Date: 4/18/25